

E. Scott Palmer, Esq., SBN 155376
Email: spalmer@pdlawyers.com
Frederick A. Haist, Esq., SBN 211322
Email: fhaist@pdlawyers.com
PALMER, LOMBARDI & DONOHUE LLP
515 South Flower Street, Suite 2100
Los Angeles, California 90071
Phone: (213) 688-0430
Fax: (213) 688-0440

Attorneys for Defendant US Bank N.A. (also erroneously sued as U.S. Bank Home Mortgage)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRISTINA VERHOEK, an
individual,

Plaintiff,

vs.

U.S. BANK NATIONAL
ASSOCIATION, a business entity of
unknown form; U.S. BANK HOME
MORTGAGE, a business entity of
unknown form; and DOES 1-50,

Defendants.

Case No. 14-cv-04821-EMC

[Assigned to the Honorable Edward M.
Chen]

**REQUEST AND STIPULATION TO
CONTINUE DATE FOR
DEFENDANT US BANK N.A.'S
RESPONSE TO PLAINTIFFS'
COMPLAINT AND TO CONTINUE
THE CASE MANAGEMENT
CONFERENCE**

[filed: September 30, 2014]

PALMER, LOMBARDI & DONOHUE LLP
515 South Flower Street, Suite 2100
Los Angeles, California 90071

1 TO THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
2 DISTRICT OF CALIFORNIA, ALL PARTIES AND THEIR ATTORNEYS OF
3 RECORD:

4 Defendant US Bank N.A. (also erroneously sued as U.S. Bank Home
5 Mortgage) (“US Bank”), and Plaintiff Christina Verhoek (“Verhoek”) have
6 discussed settlement of this case and believe that they have a tentative settlement,
7 but additional actions need to be completed before the terms can be finalized. For
8 instance, US Bank has discovered that there is a lien placed on the property by the
9 Homeowners’ Association for unpaid fees. This lien will need to be released before
10 the settlement can be finalized. The settlement will also need to be reduced to
11 writing and the Parties will need to review the settlement documents. [Haist Decl.
12 ¶3.]

13 Verhoek filed a First Amended Complaint on March 5, 2015. US Bank’s
14 response to the First Amended Complaint is due on March 26, 2015. US Bank
15 intends to move to dismiss the First Amended Complaint. The Parties believe that
16 continuing the time for US Bank to file a motion to dismiss and continuing the case
17 management conference will allow them to finalize the settlement before any further
18 motion work or use of the Court’s time due to the likely settlement of the case
19 within the next 30 days.

20 With the Court’s permission and order, US Bank and Verhoek hereby
21 stipulate to extend US Bank’s time to file a response to the First Amended
22 Complaint 30 days to April 27, 2015. US Bank has not waived any objection to the
23 venue or to the jurisdiction of the court over the person of the defendant, or any
24 other challenge to the complaint or other pleadings in this case.

25 The Court has also set a case management conference for April 2, 2015. The
26 Parties request that the Court also continue that hearing for at least 30 days to allow
27 any further pleading motions to be filed before the case management conference
28 takes place. The Parties request and stipulate that the Court can set the case

management conference on May 7, 2015 at 10:30 a.m., or as the Court otherwise orders.

DATED: March 20, 2015

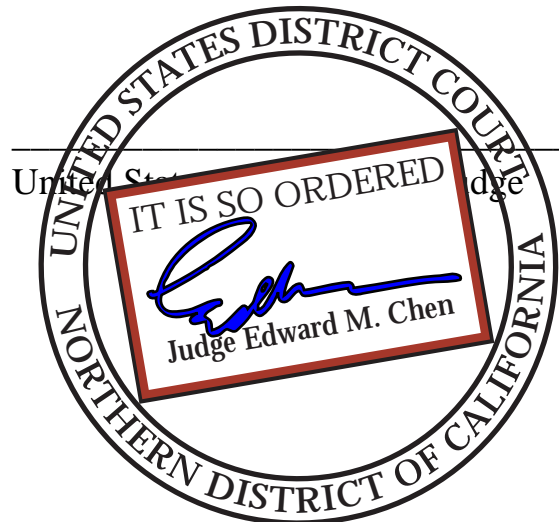
By /s/ Frederick A. Haist
E. SCOTT PALMER
FREDERICK A. HAIST
PALMER, LOMBARDI & DONOHUE LLP
Attorneys for US Bank N.A.

DATED: March 20, 2015

By /s/ Nathan L. Scheg
NATHAN L. SCHEG
IRONHORSE LAW GROUP, PC
Attorneys for Christina Verhoek

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 3/25, 2015



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Los Angeles, California 90071